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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

LANG V. NGUYEN,	)	
	)	
Plaintiff,	)	No. C 98-00072 BZ
	)	
v.	)	<b>SPECIAL VERDICT</b>
	)	
OK TU LEE, et al.,	)	
	)	
Defendants.	)	
_____	)	

We, the jury, find the following special verdict on the questions submitted to us:

**Question No. 1**

Did Defendants breach their oral contract to pay Plaintiff \$7.50 per hour for work he performed between January 8, 1996, and October 20, 1997?

Yes: \_\_\_\_\_ No: \_\_\_\_\_

If your answer is yes, proceed to the next question. If your answer is no, proceed to Question No. 3.

1 **Question No. 2**

2 What do you find to be the total amount of damages  
3 suffered by Plaintiff between January 8, 1996, and October 20,  
4 1997, as a result of Defendants' breach of the oral contract?

5 Amount: \$\_\_\_\_\_

6 Proceed to the next question.

7  
8 **Question No. 3**

9 Did Defendants fail to pay Plaintiff the lawful minimum  
10 wage between January 8, 1995, and January 7, 1996?

11 Yes: \_\_\_\_\_ No: \_\_\_\_\_

12 If your answer is yes, proceed to the next question. If  
13 your answer is no, proceed to Question No. 5

14  
15 **Question No. 4**

16 What do you find to be the total amount of damages  
17 suffered by Plaintiff between January 8, 1995, and January 7,  
18 1996, as a result of Defendants' failure to pay Plaintiff the  
19 minimum wage?

20 Amount: \$\_\_\_\_\_

21 Proceed to the next question.

22  
23 **Question No. 5**

24 Did Defendants fail to pay Plaintiff the lawful overtime  
25 rate for overtime work he performed between January 8, 1995,  
26 and October 20, 1997?

27 Yes: \_\_\_\_\_ No: \_\_\_\_\_

28 If your answer is yes, proceed to the next question. If

1 your answer is no, proceed to Question No. 7.

2  
3 **Question No. 6**

4 What do you find to be the total amount of damages  
5 suffered by Plaintiff between January 8, 1995, and October 20,  
6 1997, as a result of Defendants' failure to pay the lawful  
7 overtime rate?

8 Amount: \$\_\_\_\_\_

9 Proceed to the next question.

10  
11 **Question No. 7**

12 Did Defendants willfully fail to pay Plaintiff any earned  
13 but unpaid wages when Plaintiff's employment ended, as  
14 required by law, thereby subjecting Defendants to a penalty?

15 Yes: \_\_\_\_\_ No: \_\_\_\_\_

16 If your answer is yes, proceed to the next question. If  
17 your answer is no, proceed to Question No. 9.

18  
19 **Question No. 8**

20 What do you find to be the amount of the penalty  
21 Defendants are subject to as a result of their willful failure  
22 to pay Plaintiff his earned but unpaid wages?

23 Amount: \$\_\_\_\_\_

24  
25 **Question No. 9**

26 Did Defendants breach an implied agreement not to  
27 terminate Plaintiff except for good cause?

28 Yes: \_\_\_\_\_ No: \_\_\_\_\_

1 If your answer is yes, proceed to the next question. If  
2 your answer is no, please sign this form and return it to the  
3 Courtroom Deputy.

4  
5 **Question No. 10**

6 What do you find to be the total amount of damages  
7 suffered by Plaintiff as a result of Defendants' breach of the  
8 implied agreement not to terminate except for good cause?

9 Amount: \$\_\_\_\_\_

10  
11 Please sign this form and return it to the Courtroom  
12 Deputy.

13 Dated: March \_\_\_\_\_, 1999

14  
15  
16 \_\_\_\_\_  
Foreperson

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